

SEALED

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

FILED

2017 MAY 17 PM 4:14

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA,

Plaintiff,

v.

Raul Ramos, aka Alto, aka
Naranjo, aka GQ (1),
Victor Garcia, aka Café, aka
Pelon, aka BF (2),
Angel Cantu Garcia, aka Mad,
aka Che (3),
Robert M. Cantu, aka Rock,
aka Aguila (4),
Fernando Gonzales, aka Nando,
aka Sunny (6),
Richard Gamez, aka Richio,
aka Mack (7),
Arthur Gallegos, aka Teflon,
aka Llano (8),
Daniel Garza, aka Yogi (9),
Ricky Escobedo, aka Striker,
aka Richio, aka Guero (10),
Jimmy Lee Zuniga,
aka Goon (11),
Miguel Hernandez,
aka Mikio (12),
Ramiro R. Carrizales,
aka Rudy C (13),
Abel Joseph Guerrero,
aka Sandman, aka Plex (14),
Joe Perez III, aka JJ (15),
Julian Rosas Garza,
aka Juju (16),
Juan Jose Gonzales,
aka Wedo (17),
Roman Gabriel Gonzales,
aka Roman (18),
Joe Angel Arredondo,
aka Porkchop (19),
Johnny Ray Morales,
aka Chone (20),

SA17CR0391 XR
I N D I C T M E N T

[Vio: 18 USC § 1951: Conspiracy
to Interfere with Commerce by
Threats or Violence; 21 USC §§
846, 841(a)(1) & (B)(1)(B):
Conspiracy to Distribute
Controlled Substances; 21 USC
§§ 841(a)(1) & (B)(1)(B):
Possession with Intent to
Distribute a Controlled
Substance; 18 USC §
924(c)(1)(A)(iii): Using,
Carrying & Discharging Firearms
During and in Relation to Drug
Trafficking Crimes; 18 USC § 2:
Aiding & Abetting]

Christopher Rene Avila,
aka Doughboy (21),
Mario Vega, aka Chore (22),
Alfred Garansuay,
aka Alfred (23),
Fran Marie Gonzales,
aka China (24),
Arturo Garcia Bernal,
aka Tule (25),
Roberto Hernandez,
aka Bobby (26),
Albert Guerra Mata,
aka Pajaro (27),
Robert Eugene Hernandez,
aka Gino (28),
Jimmy Perez, aka Turtle,
aka Reaper (29),
Robert Rodriguez,
aka Chino (30),
Johnny Ramon Fonseca, aka Mad
Cow, aka MC (31),
Pedro Torrez,
aka Infamous (32),
Jesus Rodriguez,
aka Texas (33),
Frederick Rocha,
aka Lil Mac (34),
Oscar Martinez,
aka Pelon (35),
Jose Luis Cortez, aka Listo,
aka T-Bone (36), and
Marc Thomas Reyes,
aka Panda (37),

COUNT ONE

[18 USC § 1951]

Beginning on or about January 1, 2015, the exact date
unknown, and continuing to May 17, 2017, in the Western District
of Texas, Defendants,

Raul Ramos, aka Alto, aka Naranjo, aka GQ (1),
Victor Garcia, aka Café, aka Pelon, aka BF (2),
Angel Cantu Garcia, aka Mad, aka Che (3),

Robert M. Cantu, aka Rock, aka Aguila (4),
 Mariano Valdez III, aka Huesos, aka Rage (5),
 Fernando Gonzales, aka Nando, aka Sunny (6),
 Richard Gamez, aka Richio, aka Mack (7),
 Arthur Gallegos, aka Teflon, aka Llano (8),
 Daniel Garza, aka Yogi (9),
 Ricky Escobedo, aka Striker, aka Richio, aka Guero (10),
 Jimmy Lee Zuniga, aka Goon (11),
 Ramiro R. Carrizales, aka Rudy C (13),
 Abel Joseph Guerrero, aka Sandman, aka Plex (14),
 Joe Perez III, aka JJ (15),
 Julian Rosas Garza, aka Juju (16),
 Juan Jose Gonzales, aka Wedo (17),
 Roman Gabriel Gonzales, aka Roman (18),
 Johnny Ray Morales, aka Chone (20),
 Christopher Rene Avila, aka Doughboy (21),
 Mario Vega, aka Chore (22),
 Alfred Garansuay, aka Alfred (23),
 Fran Marie Gonzales, aka China (24),
 Arturo Garcia Bernal, aka Tule (25),
 Roberto Hernandez, aka Bobby (26),
 Albert Guerra Mata, aka Pajaro (27),
 Robert Eugene Hernandez, aka Gino (28),
 Jimmy Perez, aka Turtle, aka Reaper (29),
 Robert Rodriguez, aka Chino (30),
 Johnny Ramon Fonseca, aka Mad Cow, aka MC (31),
 Pedro Torrez, aka Infamous (32),
 Jesus Rodriguez, aka Texas (33),
 Frederick Rocha, aka Lil Mac (34),
 Jose Luis Cortez, aka Listo, aka T-Bone (36), and
 Marc Thomas Reyes, aka Panda (37),

did unlawfully, knowingly and intentionally conspire together and
 with others known and unknown, to obstruct, delay, and affect
 commerce and the movement of articles and commodities in commerce
 by extortion, as that term is defined in Title 18, United States
 Code, Section 1951(b)(2), in violation of Title 18, United States
 Code, Section 1951.

OBJECT OF THE CONSPIRACY

The object of the conspiracy was to extort money from drug traffickers so that the money could be distributed to members of the Texas Mexican Mafia (TMM), of which the Defendants were members, prospects and associates.

The Texas Mexican Mafia is organized in hierarchical form that includes a president, a vice president, generals, captains, lieutenants, sergeants, soldiers, prospects and associates. Full members refer to one another by the informal Spanish term for brothers: "carnales". The TMM is directed by its leadership, also known as the "mesa".

San Antonio has traditionally been the TMM's headquarters. The "free world general" usually resides in San Antonio. He is usually assisted by a Captain and Lieutenant of Lieutenants. San Antonio has traditionally been divided into four "corners": North, South, East, and West, and each corner is usually staffed by a Lieutenant, a Sergeant, and soldiers.

The TMM requires non-members who distribute narcotics to pay a ten-percent "tax" on the proceeds of their drug distribution. This extortion payment or tax is known as "the dime", "the ten percent". Tax paying drug dealers are referred to as "tiendas" or stores. Failure to pay the tax could result in serious bodily injury, robbery, or death.

The TMM leadership controls and directs collection of the drug tax. All TMM members understand and agree that drug dealers are not permitted to sell drugs without paying the tax. Once a drug dealer is identified, this information is passed up to the leadership. The leadership will make an effort to confirm this information. If the information is confirmed, soldiers are instructed to visit the dealer.

The first visit to a drug dealer may be carried out by soldiers who tell the drug dealer that they know the dealer is selling drugs and that he will have to begin paying the tax and a penalty for having sold in the past without TMM permission. If the dealer denies the charge he may be ordered to pay more. If the dealer refuses, he may be robbed and beaten. If the first visit does not convince the dealer to comply, the second visit will be a "door kick", or home invasion. The front door is kicked in, armed gang members storm the home, occupants may be restrained, and anything of value, such as narcotics, jewelry, electronics, guns, and automobiles are seized. After a door kick, most dealers begin paying the tax.

A carnal keeps the first two weeks of payments made by a drug trafficker when the carnal is the one who identified the drug dealer and put them "on the books". The sergeant and lieutenant take a percentage and pass the remainder up to the lieutenant-of-lieutenants, captain or general. The top leadership

also takes a percentage (referred to as a "paycheck") before distributing the remainder to incarcerated members and the family of the TMM's founder.

MANNER AND MEANS

It was part of the conspiracy that the Defendants would carry out the extortion by:

1. Requiring drug traffickers to pay the extortion tax to members of the Texas Mexican Mafia or face assault, robbery, or murder; and

2. Using violence in all forms and degrees to enforce the Texas Mexican Mafia's requirement that all drug distributors pay the tax in exchange for permission granted by members of the Texas Mexican Mafia to distribute narcotics.

OVERT ACTS

1. On or before January 1, 2015, **Raul Ramos, aka Alto, aka Naranjo, aka GQ (1)**, assumed the rank of TMM Free World General.
2. On or before January 1, 2015, **Victor Garcia, aka Café, aka Pelon, aka BF (2)**, assumed the rank of TMM Captain.
3. On or before January 1, 2015, **Mariano Valdez, aka Huesos, aka Rage (5)**, assumed the rank of TMM Lt. of Lts.
4. On or about October 1, 2015, **Angel Cantu Garcia, aka Mad, aka Che (3)**, assumed the rank of TMM Lt. of Lts.
5. On or about December 15, 2015, TMM Member **Daniel Garza, aka Yogi (9)**, collected a \$200 dime payment from XX in San Antonio, Texas.

6. On or about February 23, 2016 - TMM Member **Daniel Garza, aka Yogi (9)**, collected a \$200 dime payment from XX in San Antonio, Texas.
7. On or about April 11, 2016, TMM Member **Ramiro R. Carrizales, aka Rudy C (13)**, collected \$400 in dime payments from XX in San Antonio, Texas.
8. On or about May 19, 2016, TMM Member **Robert Eugene Hernandez, aka Gino (28)**, collected \$200 in dime payments from XX in San Antonio, Texas.
9. On or about July 2, 2016, TMM member **Robert Rodriguez, aka Chino (30)**, and other TMM members and prospects conducted a home invasion in San Antonio, Texas, held V1 and his family at gun point, and took money, jewelry, electronics, shoes, purses, and articles of clothing, valued at approximately \$30,000 as back payment and fines because V1 was not paying the dime.
10. On or about July 16 & 23, 2016, TMM members **Ricky Escobedo, aka Striker, aka Guero (10)**, and **Richard Gamez, aka Richio, aka Mack (7)**, conducted a home invasion and took \$8,000 in U.S. currency and a white Mercedes ES230 passenger car, to fulfill an additional \$10,000 fine owed to the TMM by V1 because V1 was distributing narcotics while "not on the books" (not paying weekly dime payments).
11. On or about July 25, 2016, TMM members **Arturo Bernal Garcia, aka Tule (25)**, and **Roberto Hernandez, aka Bobby (26)**, collected \$400 in dime payments from XX in San Antonio, Texas.
12. On or about August 11, 2016, TMM member **Arturo Bernal Garcia, aka Tule (25)**, collected \$200 in dime payments from XX in San Antonio, Texas.
13. On or about September 8, 2016, TMM members and associates **Juan Jose Gonzales, aka Wedo (17)**, **Fran Marie Gonzales, aka China (24)**, **Alfred Garansuay, aka Alfred (23)**, and **Christopher Rene Avila, aka Doughboy (21)**, followed and attempted to apprehend V2, the driver of a black Mustang whom they believed to be a non-paying drug dealer.
14. On or about September 9, 2016, TMM members and associates **Johnny Morales, aka Chone (20)**, **Christopher Rene**

- Avila, aka Doughboy (21), and Mario Vega, aka Chore (22), conducted a home invasion at V2's house, and took personal items to fulfill a "fine" owed to the TMM by V2 because V2 was distributing narcotics while "not on the books".
15. On or about September 16, 2016, TMM member **Juan Jose Gonzales, aka Wedo (17)**, collected the dime from V2 in San Antonio, Texas.
 16. On or about September 23, 2016, TMM member **Juan Jose Gonzales, aka Wedo (17)**, collected the dime from V2 in San Antonio, Texas.
 17. On or about September 30, 2016, ranking TMM member **Julian Rosas Garza, aka JuJu (16)**, worked out a fine and weekly payment schedule with V2 in San Antonio, Texas.
 18. On or about October 1, 2016, **Robert M. Cantu, aka Rock, aka Aguila (4)**, assumed the rank of TMM Lt of LTs, replacing Mariano Valdez, aka Rage (5).
 19. On or about October 20, 2016, TMM member **Alfred Garansuay, aka Alfred (23)**, TMM prospect **Jesus Rodriguez, aka Texas (33)**, and two other TMM members and associates were in possession of firearms, in a vehicle, in San Antonio, Texas.
 20. On or about October 27, 2016, TMM member **Juan Jose Gonzales, aka Wedo (17)**, possessed a firearm in his San Antonio residence.
 21. On or about November 5, 2016, ranking TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)**, and TMM member **Jimmy Lee Zuniga, aka Goon (11)**, discussed an unnamed male (UM) who "was complying" and had agreed to keep paying the dime to the TMM, but "may want to stop," until Zuniga explained that the UM "needed to keep going because regardless he's gonna have to come through with it."
 22. On or about November 6, 2016, TMM member **Jimmy Lee Zuniga, aka Goon (11)**, collected the dime in Pleasanton, Poteet and Jourdanton.
 23. On or about November 6, 2016, TMM member **Jimmy Lee Zuniga, aka Goon (11)**, returned to San Antonio, and handed over the "receipts" (dime collection) to ranking TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)**.

24. On or about November 7, 2016, ranking TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)**, and TMM member **Jimmy Lee Zuniga, aka Goon (11)**, discussed changing the dime collection in Pleasanton, Poteet and Jourdanton from Sundays to Saturdays.
25. On or about November 12, 2016, TMM member **Fernando Gonzales, aka Nando, aka Sunny (6)**, collected a \$100 weekly dime payment from V1 in San Antonio, Texas.
26. On or about November 15, 2016, TMM member **Albert G. Mata, aka Pajaro (27)**, collected \$100 dime payment from XX in the parking lot in San Antonio, Texas.
27. On or about November 16, 2016, TMM member **Pedro Torrez, aka Infamous (32)**, sent a text message to ranking TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)**, regarding collection of the dime from Pleasanton, Poteet, Charlotte and Floresville.
28. On or about November 17, 2016, ranking TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)**, and TMM member **Pedro Torrez, aka Infamous (32)**, discussed problems collecting the dime from FNU LNU, aka Spider.
29. On or about November 18, 2016, TMM member **Fernando Gonzales, aka Nando, aka Sunny (6)**, collected a \$100 weekly dime payment from V1 in San Antonio, Texas.
30. On or about November 18, 2016, TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)**, and TMM member **Jimmy Lee Zuniga, aka Goon (11)**, discussed problems collecting the dime from FNU LNU, aka Jaime.
31. On or about November 19, 2016, ranking TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)**, and TMM member **Jimmy Lee Zuniga, aka Goon (11)**, discussed a female Zuniga normally collected the dime from who was "recently killed" in the area of Hays Street, and because she was deceased, he would not be "collecting from her anymore".
32. On or about November 20, 2016, ranking TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)**, and TMM member **Jimmy Lee Zuniga, aka Goon (11)**, discussed problems collecting the dime in Floresville.

33. On or about November 22, 2016, ranking TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)**, and TMM member **Pedro Torrez, aka Infamous (32)**, discussed problems with FNU LNU, aka Kxxx, resulting in **Cantu** directing **Torrez** to tell "Kxxx" that if "[they] find out that he's doing something, [they] are going to take all his shit."
34. On or about November 26, 2016, TMM member **Fernando Gonzales, aka Nando, aka Sunny (6)**, collected a \$100 weekly dime payment from V1 in San Antonio, Texas.
35. On or about December 1, 2016, ranking TMM member **Abel Joseph Guerrero, aka Sandman, aka Plex (14)**, and a TMM prospect discussed a failed attempt to collect the dime that resulted in a shoot-out between TMM (including **Marc Thomas Reyes, aka Panda (37)**) and Orejon gang members.
36. On or about December 2, 2016, TMM member **Roman Gabriel Gonzales, aka Roman (18)**, told another TMM member that he was going to put "that chick" on the books, at "\$200 per month" ... she will be "selling the green", getting a pound at a time, starting January 1st.
37. On or about December 3, 2016, TMM members **Joe Perez, aka JJ (15)**, and **Abel Joseph Guerrero, aka Sandman, aka Plex (14)**, discussed their list of individuals from whom Perez was trying to collect the dime.
38. On or about December 3, 2016, TMM member **Abel Joseph Guerrero, aka Sandman, aka Plex (14)**, and ranking TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)**, discussed the need for more firepower rather than the small handguns that they had been using when conducting unsuccessful home invasions.
39. On or about December 4, 2016, ranking TMM members **Abel Joseph Guerrero, aka Sandman, aka Plex (14)**, and **Joe Perez, aka JJ (15)**, discussed how to calculate their 25% cut of the weekly \$3,435 dime payments.
40. On or about December 7, 2016, TMM members **Fernando Gonzales, aka Nando, aka Sunny (6)**, and **Richard Gamez, aka Richio, aka Mack (7)**, collected a \$100 weekly dime payment from V1 in San Antonio, Texas.
41. On or about December 8, 2016, ranking TMM member **Abel Joseph Guerrero, aka Sandman, aka Plex (14)**, and ranking TMM member **Jimmy Perez, aka Turtle, aka Reaper (29)**, discussed

whether or not suspected drug dealer "Sxxxx" was on the books for dime payment purposes.

42. On or about December 11, 2016, ranking TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)**, and TMM member **Pedro Torrez, aka Infamous (32)**, discussed a suspected drug dealer in Poth who needed to "to come up with that money".
43. On or about December 17, 2016, TMM member **Fernando Gonzales, aka Nando, aka Sunny (6)**, collected a \$100 weekly dime payment from V1 in San Antonio, Texas.
44. On or about December 17, 2016, TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)**, and TMM member **Jimmy Lee Zuniga, aka Goon (11)**, discussed dime collection problems with three drug dealers regarding the change in collection from Sunday to Saturday: "it doesn't matter which day it is, you have a week to come up with the f*#@ing money, I aint trying to hear that s&t, if ya'll can't do it then let me know and I will just charge you double next week...".
45. On or about December 19, 2016, ranking TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)**, and TMM member **Jimmy Lee Zuniga, aka Goon (11)**, discussed collection of the dime in Jourdanton.
46. On or about December 19, 2016, ranking TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)**, and TMM member **Pedro Torrez, aka Infamous (32)**, discussed "a homeboy that needed to be put on the books."
47. On or about December 23, 2016, TMM member **Fernando Gonzales, aka Nando, aka Sunny (6)**, collected a \$100 weekly dime payment from V1 in San Antonio, Texas.
48. On or about December 30, 2016, TMM member **Fernando Gonzales, aka Nando, aka Sunny (6)**, collected a \$100 weekly dime payment from V1 in San Antonio, Texas.
49. On or about December 30, 2016, ranking TMM members **Robert M. Cantu, aka Rock, aka Aguila (4)**, **Julian Rosas Garza, aka Juju (16)**, **Jimmy Perez, aka Turtle, aka Reaper (29)**, TMM member **Jimmy Ramon Fonseca, aka Mad Cow, aka MC (31)**, and a ranking Texas Syndicate (TS) member all discussed a suspected drug dealer known as "Mxxxx", who "was moving a lot of stuff" and was doing so while "not on the books."

50. On or about January 3, 2017, ranking TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)**, told a TMM member that he (Cantu) had "put Goon (**Jimmy Lee Zuniga, aka Goon (11)**) over there, to pick up those receipts from those tiendas," and that he (Cantu) "did not want anyone else doing so."
51. On or about January 3, 2017, TMM members **Julian Rosas Garza, aka JuJu (16)**, **Jesus Rodriguez, aka Texas (33)**, and 2 other TMM members and associates assaulted "Lxx" (who was selling narcotics in San Antonio), took his car, and put him "on the books".
52. On or about January 3, 2017, TMM member **Roman Gabriel Gonzales, aka Roman (18)**, told another TMM member that he was collecting \$100 every 2 weeks from Bxxxxx LNU.
53. On or about January 5 and 6, 2017, ranking TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)**, and TMM member **Fernando Gonzales, aka Nando, aka Sunny (6)**, discussed TMM members **Richard Gamez, aka Richio, aka Mack (7)**, and **Fernando Gonzales, aka Nando, aka Sunny (6)** putting "Nxxxxx" on the books for \$200 per week.
54. On or about January 7, 2017, TMM member **Fernando Gonzales, aka Nando, aka Sunny (6)**, collected a \$100 weekly dime payment from V1 in San Antonio, Texas.
55. On or about January 13, 2017, ranking TMM members **Robert M. CANTU, aka Rock, aka Aguila (4)**, and **Jimmy Perez, aka Turtle, aka Reaper (29)**, discussed a dime collection problem: "Hey carnal, that guy gave in, he doesn't want any problems, but the guy said he's struggling a little so he needs some time to come up with the money."
56. On or about, January 13, 3017, TMM members **Jimmy Perez, aka Turtle, aka Reaper (29)**, **Johnny Ramon Fonseca, aka Mad Cow, aka MC (31)**, and **Robert Rodriguez, aka Chino (30)**, attempted to collect the dime from "Qxxxxx", an Orejon Gang member, at a San Antonio residence, resulting in a shootout between the two rival gangs.
57. On or about January 14, 2017, ranking TMM member **Jimmy Perez, aka Turtle, aka Reaper (29)**, discussed the failed attempt to collect the dime from "Qxxxxx", which resulted in a shootout between the TMM and Orejones, and told ranking TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)**, "Those motherf@#ers came at us hard today!"

58. On or about January 15, 2017, ranking TMM member **Julian Rosas Garza, aka Juju (16)**, and another TMM member discussed TMM members **Jimmy Perez, aka Turtle, aka Reaper (29)**, and **Johnny Ramon Fonseca, aka Mad Cow, aka MC (31)**, getting into a shootout when they had gone by a residence *"to take care of something and it didn't go as planned..."*.
59. On or about January 16, 2017, TMM member **Fernando Gonzales, aka Nando, aka Sunny (6)**, collected a \$100 weekly dime payment from V1 in San Antonio, Texas.
60. On or about January 17, 2017, TMM member **Jimmy Perez, aka Turtle, aka Reaper (29)**, and former ranking TMM member **Mariano Valdez, aka Huesos, aka Rage (5)**, discussed the failed dime collection attempt involving *"Qxxxx"*.
61. On or about January 17, 2017, ranking TMM members **Robert M. Cantu, aka Rock, aka Aguila (4)**, and **Jimmy Perez, aka Turtle, aka Reaper (29)**, discussed the recent failed dime collection attempt, wherein Cantu stated that he placed Perez there because he knew that he (Perez) would do what needed to get done.
62. On or about January 20, 2017, ranking TMM members **Robert M. Cantu, aka Rock, aka Aguila (4)**, and **Jimmy Perez, aka Turtle, aka Reaper (29)**, discussed a problem dime collection situation, in which Perez advised Cantu that he (Perez) was *"waiting for that guy to pay that fine,"* but that he (Perez) *"told him he (Perez) needed the money today..."* Perez then advised Cantu that the *"guy got in line quick and did not want any trouble"* and that he (Perez) *"would turn it into (Cantu) as soon as he (Perez) got it."*
63. On or about January 21, 2017, ranking TMM members **Robert M. Cantu, aka Rock, aka Aguila (4)**, and **Jimmy Perez, aka Turtle, aka Reaper (29)**, discussed the location and status of a non-paying drug dealer.
64. On or about January 22, 2017, TMM member **Fernando Gonzales, aka Nando, aka Sunny (6)**, collected a \$100 weekly dime payment from V1 in San Antonio, Texas.
65. On or about January 27, 2017, ranking TMM members **Robert M. Cantu, aka Rock, aka Aguila (4)**, and **Jimmy Perez, aka Turtle, aka Reaper (29)**, discussed the dime collection of a person they suspected was *"moving stuff"* and Perez assured

Cantu that he (Perez) was "going to go by there and see what's up."

66. On or about January 28, 2017, TMM member **Fernando Gonzales, aka Nando, aka Sunny (6)**, collected a \$100 weekly dime payment from V1 in San Antonio, Texas.
67. On or about January 28, 2017, a TMM member collected dime payments from individuals involved in drug trafficking on the Southside of San Antonio.
68. On or about January 29, 2017, a TMM member submitted the previous day's Southside dime collection, \$1,982.00, to TMM Lt. of Lts. **Angel Cantu Garcia, aka Mad, aka Che (3)**.
69. On or about January 30, 2017, TMM member **Fernando Gonzales, aka Nando, aka Sunny (6)**, described to ranking TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)**, how he and TMM member **Richard Gamez, aka Richio, aka Mack (7)**, took "care of Sxxxxx", seized "5 racks", and "set her at 10 back" and "\$150 per week." Cantu agreed to provide Gonzales and Gamez an amount of money (out of the \$5,000) to them for their work.
70. On or about February 3, 2017, ranking TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)**, and TMM member **Fernando Gonzales, aka Nando, aka Sunny (6)**, discussed contact with Gallo, the carnal from Laredo who delivers Laredo's monthly dime payment to the TMM leadership in San Antonio.
71. On or about February 4, 2017, a TMM member collected dime payments from individuals involved in drug trafficking on the Southside of San Antonio and then submitted that \$2,131.00 to TMM Lt. of Lts. **Angel Cantu Garcia, aka Mad, aka Che (3)**.
72. On or about February 8, 2017, ranking TMM members **Robert M. Cantu, aka Rock, aka Aguila (4)**, **Jimmy Perez, aka Turtle, aka Reaper (29)**, and TMM member **Johnny Ramon Fonseca, aka Mad Cow, aka MC (31)**, all discussed a dime collection problem.
73. On or about February 9, 2017, TMM member **Pedro Torrez, aka Infamous (32)**, texted the address of a suspected drug dealer to ranking TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)**.

74. On or about February 10, 2017, ranking TMM member **Robert Cantu, aka Rock, aka Aguila (4)**, and TMM member **Pedro Torrez, aka Infamous (32)**, discussed the address that they had texted about the prior day.
75. On or about February 11, 2017, TMM member **Fernando Gonzales, aka Nando, aka Sunny (6)**, collected a \$100 weekly dime payment from V1 in San Antonio, Texas.
76. On or about February 11, 2017, a TMM member collected dime payments from individuals involved in drug trafficking on the Southside of San Antonio and then submitted that \$1,807.00 to TMM Lt. of Lts. **Angel Cantu Garcia, aka Mad, aka Che (3)**.
77. On or about February 16, 2017, TMM member **Fernando Gonzales, aka Nando, aka Sunny (6)**, collected a \$100 weekly dime payment from V1 in San Antonio, Texas.
78. On or about February 18, 2017, a TMM member collected dime payments from individuals involved in drug trafficking on the Southside of San Antonio and then submitted that \$1,790.00 to TMM Lt. of Lts. **Angel Cantu Garcia, aka Mad, aka Che (3)**.
79. On or about February 20, 2017, TMM member **Pedro Torrez, III, aka Infamous (32)**, told ranking TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)**, that a guy named Bxxx Axxxxx was "going to come this way" and "needed to be put on the books".
80. On or about February 25, 2017, a TMM member collected dime payments from individuals involved in drug trafficking on the Southside of San Antonio and then submitted that \$1,798.00 to TMM Lt. of Lts. **Angel Cantu Garcia, aka Mad, aka Che (3)**.
81. On or about March 3, 2017, ranking TMM member **Robert M Cantu, aka Rock, aka Aguila (4)**, collected a \$100 weekly dime payment from XX in San Antonio, Texas.
82. On or about March 4, 2017, a TMM member collected dime payments from individuals involved in drug trafficking on the Southside of San Antonio and then submitted that \$2,282.00 to TMM Lt. of Lts. **Angel Cantu Garcia, aka Mad, aka Che (3)**.

83. On or about March 4 & 5, 2017, TMM member **Ricky Escobedo, aka Striker, aka Guero (10)**, told ranking TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)**, that he (Escobedo) would begin collecting the dime on the Northside, following the arrest of TMM Northside Sgt **Richard Gamez, aka Richio, aka Mack (7)**.
84. On or about March 11, 2017, a TMM member collected dime payments from individuals involved in drug trafficking on the Southside of San Antonio and then submitted that \$1,794.00 to TMM Lt. of Lts. **Angel Cantu Garcia, aka Mad, aka Che (3)**.
85. On or about March 11, 2017, ranking TMM member **Robert M Cantu, aka Rock, aka Aguila (4)**, collected a \$100 weekly dime payment from V1 in San Antonio, Texas.
86. On or about March 12, 2017, ranking TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)**, tasked TMM member **Pedro Torrez, III, aka Infamous (32)**, with determining the name and address of a suspected drug dealer known only as "Cxxxxxxx".
87. On or about March 14, 2017, ranking TMM member **Jimmy Perez, aka Turtle, aka Reaper (29)**, asked permission from ranking TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)**, to "take something from someone that was doing something." Cantu asked Perez if "the guy was on the books," to which Perez replied, "No bro, that vato's a nobody." Perez told Cantu that he (Perez) "will give you your cut once we do it." Cantu agreed. Cantu cautioned Perez to "be careful," and Perez agreed. Perez advised Cantu that "[they] planned on doing it Thursday or Friday...".
88. On or about March 18, 2017, a TMM member collected dime payments from individuals involved in drug trafficking on the Southside of San Antonio and then submitted that \$1,857.00 to TMM Lt. of Lts. **Angel Cantu Garcia, aka Mad, aka Che (3)**.
89. On or about March 24, 2017, TMM member **Pedro Torrez, III, aka Infamous (32)**, sent ranking TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)**, text messages with Cxxxxxxx's suspected address.
90. On or about March 25, 2017, a TMM member collected dime payments from individuals involved in drug trafficking on the Southside of San Antonio and then submitted that

\$1,794.00 to TMM Lt. of Lts. **Angel Cantu Garcia, aka Mad, aka Che (3)**.

91. On or about March 26, 2017, TMM members **Arthur Gallegos, aka Teflon, aka Llano (8)**, and **Jose Luis Cortez, aka Listo, aka T-Bone (36)** collected a \$200 weekly dime payment from V1 in San Antonio, Texas.
92. On or about March 26, 2017, TMM members **Arthur Gallegos, aka Teflon, aka Llano (8)**, and **Jose Luis Cortez, aka Listo, aka T-Bone (36)** met with ranking TMM member **Robert M. Cantu, aka Rock, aka Aguila (4)** in San Antonio, where Gallegos submitted the weekly dime collection monies to Cantu.
93. On or about March 30, 2017, TMM member **Frederick Rocha, aka Lil Mac (34)**, identified the three possible non-paying "tiendas" and submitted the handwritten list to TMM member **Roman Gabriel Gonzales, aka Roman (18)**.
94. On or about April 1, 2017, a TMM member collected dime payments from individuals involved in drug trafficking on the Southside of San Antonio and submitted that \$2,038.00 to TMM Lt. of Lts. **Angel Cantu Garcia, aka Mad, aka Che (3)**.
95. On or about April 4, 2017, TMM member **Roman Gabriel Gonzales, aka Roman (18)**, told another TMM member that he had \$200 from Bxxxxx's monthly dime payment.
96. On or about April 8, 2017, a TMM member collected dime payments from individuals involved in drug trafficking on the Southside of San Antonio and then submitted that \$1,707.00 to TMM Lt. of Lts. **Angel Cantu Garcia, aka Mad, aka Che (3)**.
97. On or about April 8, 2017, TMM Lieutenant of Lieutenants **Robert M. Cantu, aka Rock, aka Aguila (4)**, TMM Lieutenant of Lieutenants **Angel Cantu Garcia, aka Mad, aka Che (3)**, former TMM Lieutenant of Lieutenants, **Mariano Valdez III, aka Huesos, aka Rage (5)**, and TMM "Free-World" General, **Raul Ramos, aka Alto (1)**, all met with TMM Captain of Captains, **Victor Garcia, aka Café, aka Pelon, aka BF (2)**, at Garcia's San Antonio residence to discuss TMM business, where they decided to task each "corner" to identify and turn in another two "tiendas" per week.

98. On or about April 10, 2017, Raul Ramos, aka Alto, aka Naranjo, aka GQ (1), and Victor Garcia, aka Café, aka Pelon, aka BF (2), possessed approximately one pound of marijuana, \$3,620.00, and documents and handwritten notes to and from TMM Founder and Vice President, relating to Ramos' leadership of the free world TMM.
99. On or about April 11, 2017, TMM member Pedro Torrez, aka Infamous (32), told TMM Lt. of Lts. Robert M. Cantu, aka Rock, aka Aguila (4), that "Roman (Roman Gabriel Gonzales, aka Roman (18)) gave [him] some coin from New Braunfels and some addresses".
100. On or about April 12, 2017, TMM member Roman Gabriel Gonzales, aka Roman (18), told TMM Lt. of Lts. Robert M. Cantu, aka Rock, aka Aguila (4), regarding the dime collection information on the hand written list, "Lil Mac (Frederick Rocha (35)) had sent him (Gonzales) them addresses", that "they're good to go," and that "Lil Mac was looking into a few others for us".
101. On or about April 15, 2017, a TMM member collected dime payments from individuals involved in drug trafficking on the Southside of San Antonio and then submitted that \$1,519.00 to TMM Lt. of Lts. Angel Cantu Garcia, aka Mad, aka Che (3).
102. On or about April 17, 2017, TMM member Roman Gabriel Gonzales, aka Roman (18), spoke to another TMM member about the initial dime collection monies going to the carnal who identified the tienda and put them on the books, asking "hey but on this other dude, the first one goes to Lil Mac (Frederick Rocha, aka Lil Mac, (35)) right, and the second one does too?"
103. On or about April 18, 2017, TMM Lt. of Lts. Robert M. Cantu, aka Rock, aka Aguila (4), and TMM member Jimmy Lee Zuniga, aka Goon (11), discussed a vehicle that had been taken "from a guy who owed".
104. On or about April 19, 2017, TMM Captain of Captains Victor Garcia, aka Café, aka Pelon, aka BF (2) and TMM Free World General Raul Ramos, aka Alto, aka Naranjo, aka GJ (1), discussed Ramos' weekly "paycheck" from the TMM's dime collection when Garcia stated "It's you who has all the money. The big payments you get", ... and ... "What you get a week is quite . . . quite a lot dude."

105. On or about April 20, 2017, TMM member **Ricky Escobedo, aka Striker, aka Guero (10)**, collected \$200.00 in weekly dime payments from V1 in San Antonio, Texas.
106. On or about April 22, 2017, a TMM member collected dime payments from individuals involved in drug trafficking on the Southside of San Antonio and then submitted that \$2,057.00 to TMM Lt. of Lts. **Angel Cantu Garcia, aka Mad, aka Che (3)**.
107. On or about April 23, 2017 TMM member **Ricky Escobedo, aka Striker, aka Guero (10)**, collected \$200.00 in weekly dime payments from V1 in San Antonio, Texas.
108. On or about April 23, 2017 TMM member **Ricky Escobedo, aka Striker, aka Guero (10)**, turned over dime collection proceeds to TMM member **Arthur Gallegos, aka Teflon, aka Llano (8)**, in San Antonio, Texas.
109. On or about April 29, 2017, TMM Lt. of Lts. **Robert M. Cantu, aka Rock, aka Aguila (4)**, told TMM member **Jimmy Lee Zuniga, aka Goon (11)**, to meet up with "Teflon" (TMM member **Arthur Gallegos (8)**) to go to an address that needed to be collectively investigated by the TMM and TS.
110. On or about April 29, 2017, ranking TMM members **Robert M. Cantu, aka Rock, aka Aguila (4)**, and **Jimmy Perez, aka Turtle, aka Reaper (29)**, discussed the taxing of TMM member **Pedro Torrez III, aka Infamous (32)**'s girlfriend, by two persons claiming to be TMM.
111. On or about April 29, 2017, TMM Lt. of Lts. **Robert M. Cantu, aka Rock, aka Aguila (4)**, told ranking TMM member **Arthur Gallegos, aka Teflon, aka Llano (8)**, that if he (Gallegos) ever needed "people for hits" then he (Gallegos) should call Perez (**Jimmy Perez, aka Turtle, aka Reaper (29)**) or Perez' partner, **Fonseca (Johnny Ramon Fonseca, aka Mad Cow, aka MC (31))**, and that "they have a crew that can go take care of that stuff."
112. On or about April 29, 2017, a TMM member collected dime payments from individuals involved in drug trafficking on the Southside of San Antonio and submitted that \$1,944.00 to TMM Lt. of Lts. **Angel Cantu Garcia, aka Mad, aka Che (3)**.

113. On or about April 30, 2017, TMM member **Ricky Escobedo, aka Striker, aka Guero (10)**, collected \$200 to cover 2 weekly dime payments from V1 in San Antonio, Texas.

114. On or about May 3, 2017, ranking TMM member, **Roman Gabriel Gonzales, aka Roman (18)**, told another TMM member that "*Lil Mac*" (TMM member **Frederick Rocha (34)**) had gone and "*hit up ole boy from over there at the Dairy Queen*" and had put him "*on the books*", and that he (Rocha) had "*kept the first two, but starting on the next one it'll go to the canton*".

115. On or about May 6, 2017, Jose LNU asked TMM Lt. of Lts. **Angel Cantu Garcia, aka Kickback, aka Mad, aka Che (3)**, if Garcia "still had the .357" adding a friend was interested in buying it. Garcia indicated "a friend" had borrowed "it" and Garcia would need to go get it. Jose LNU asked if "it was clean"; Garcia told Jose LNU it was "really dirty."

All in violation of Title 18, United States Code, Section 1951.

COUNT TWO

[21 USC § 846 to violate §§ 841(a)(1) & 841(b)(1)(B)]

That beginning on or about January 1, 2015, the exact date unknown, and continuing until on or about May 17, 2017, in the Western District of Texas, Defendants,

Raul Ramos, aka Alto, aka Naranjo, aka GQ (1),
Victor Garcia, aka Café, aka Pelon, aka BF (2),
Angel Cantu Garcia, aka Mad, aka Che (3),
Robert M. Cantu, aka Rock, aka Aguila (4),
Mariano Valdez, aka Huesos, aka Rage (5),
Fernando Gonzales, aka Nando, aka Sunny (6),
Richard Gamez, aka Richio, aka Mack (7),
Daniel Garza, aka Yogi (9),
Ricky Escobedo, aka Striker, aka Richio, aka Guero (10),
Miguel Hernandez, aka Mikio (12),
Ramiro R. Carrizales, aka Rudy C (13),
Abel Joseph Guerrero, aka Sandman, aka Plex (14),
Joe Perez III, aka JJ (15),
Julian Rosas Garza, aka Juju (16),
Juan Jose Gonzales, aka Wedo (17),

Roman Gabriel Gonzales, aka Roman (18),
Joe Angel Arredondo, aka Porkchop (19),
Johnny Ray Morales, aka Chone (20),
Christopher Rene Avila, aka Doughboy (21),
Alfred Garansuay, aka Alfred (23),
Fran Marie Gonzales, aka China (24),
Arturo Garcia Bernal, aka Tule (25),
Roberto Hernandez, aka Bobby (26),
Albert Guerra Mata, aka Pajaro (27),
Jimmy Perez, aka Turtle, aka Reaper (29),
Pedro Torrez, aka Infamous (32),
Jesus Rodriguez, aka Texas (33),
Oscar Martinez, aka Pelon (35), and
Marc Thomas Reyes, aka Panda (37),

unlawfully, knowingly, and intentionally combined, conspired, confederated and agreed together and with others known and unknown to distribute and to possess with intent to distribute controlled substances, which offense involved 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, and 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, contrary to Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(B) and in violation of Title 21, United States Code, Section 846.

COUNT THREE

[21 USC §§ 841(a)(1) & 841(b)(1)(B) and 18 USC 2]

That on or about January 30, 2017, in the Western District of Texas, Defendants,

Juan Jose Gonzales, aka Wedo (17),
Joe Angel Arredondo, aka Porkchop (19), and
Johnny Ray Morales, aka Chone (20),

aided and abetted by each other, unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, which offense involved 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(B).

COUNT FOUR

[18 USC §§ 924(c)(1)(A)(iii) and 2]

That on or about January 30, 2017, in the Western District of Texas, Defendants,


Juan Jose Gonzales, aka Wedo (17),
Joe Angel Arredondo, aka Porkchop (19), and
Johnny Ray Morales, aka Chone (20),

aided and abetted by each other, and during and in relation to drug trafficking crimes, did knowingly use, carry and discharge at least one firearm, specifically, a ROMARM-CUGIR, 7.62x39 caliber semiautomatic rifle, serial number 1965150736, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2.

A TRUE BILL,


FOREPERSON

RICHARD L. DURBIN, Jr.
United States Attorney


DAVID M. SHEARER
Assistant United States Attorney